

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

|                                       |   |  |
|---------------------------------------|---|--|
| <b>ZERMATT HOLDINGS, LLC, et al.,</b> | ) | <b>CASE NO. 3:23-cv-01423-JJH</b>            |
|                                       | ) |  |
| <b>Plaintiffs,</b>                    | ) | <b>JUDGE HELMICK</b>                         |
|                                       | ) |  |
| <b>v.</b>                             | ) | <b>Unopposed Motion by Defendants for</b>    |
|                                       | ) | <b>Extension of Time to Respond to First</b> |
| <b>COOPER, et al.,</b>                | ) | <b>Amended Complaint</b>                     |
|                                       | ) |  |
| <b>Defendants.</b>                    | ) |  |

Defendants Martin Christopher Cooper and Chris Cooper & Company, Inc. (collectively, “Defendants”) respectfully move this Court for an additional 21 days, to and through November 10, 2023, to respond to Plaintiffs’ First Amended Complaint. Defendant Cooper resides in California, and Defendants engaged undersigned counsel yesterday.

The extension is warranted to permit Defendants’ counsel time to investigate Plaintiffs’ allegations and to consider their defenses and responses thereto. Good cause, therefore, exists to grant the motion. This is Defendants’ first request for an extension.

Defendants’ counsel contacted Plaintiffs’ counsel yesterday, and Plaintiffs do not oppose this motion for extension of time.

For the foregoing reasons, Defendants respectfully request that they be granted 21 days—to and through November 10, 2023—to respond to Plaintiffs’ First Amended Complaint.

Dated: October 20, 2023

Respectfully submitted,

/s/ Philip R. Bautista

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 20, 2023, I filed the foregoing using the Court's CM/ECF system, which will send electronic notice of such filing to all parties of record.

/s/ Philip R. Bautista

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